

Sage Legal LLC

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July 28, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James R. Cho, U.S.M.J.
225 Cadman Plaza East, Courtroom 11D
Brooklyn, NY 11201-1804

Re: Graziano v. MBLIC Motors LLC
Case No.: 1:25-cv-2943 (NGG) (JRC)

Dear Judge Cho:

This firm represents the Defendant MBLIC Motors LLC d/b/a Empire Cadillac (hereinafter the “Defendant” or the “Dealership”) in the above-referenced case. Defendant writes to respectfully request an extension of time of sixty (60) days to respond to the complaint.

Pursuant to ¶ C(2) of this Court’s Individual Practices, Defendant respectfully submits that:

- (i) the original date a response to the complaint was due on June 30, 2025 according to the docket;
- (ii) there have been no previous requests for an extension of time of this deadline;
- (iii) since there was no previous request, it was neither granted or denied;
- (iv) Plaintiff does *not* consent to the requested extension of time; and
- (v) Defendant does not believe this request affects any other scheduled Court appearance or deadline.

The reason for the request is because your undersigned is scheduled to travel from August 1, 2025 through August 5, 2025 and August 21, 2025 through September 2, 2025, and the Defendant’s General Counsel is out on vacation this week. Given that your undersigned was only recently retained, Defendant respectfully submits that good cause and excusable neglect exists based on the foregoing circumstances. See Fed. R. Civ. P. 6(b)(1)(B). Further, the parties’ counsel have previously worked together to resolve similar cases and have already begun discussing resolution.

Defendant thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
July 28, 2025

Respectfully submitted,

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.
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